



California Regional Water Quality Control Board

Santa Ana Region



inda S. Adams
Secretary for
Environmental Protection

3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (951) 782-4130 • FAX (951) 781-6288 • TDD (951) 782-3221
www.waterboards.ca.gov/santaana

Arnold Schwarzenegger
Governor

June 25, 2008

Base Realignment and Closure
Attn: Ms. Debra Theroux
Deputy Base Closure Manager
7040 Trabuco Road
Irvine, California 92618

**COMMENTS ON DRAFT LETTER REPORT, GROUNDWATER MONITORING FOR
PETROLEUM HYDROCARBONS AT INSTALLATION RESTORATION PROGRAM
(IRP) SITE 1, FORMER MARINE CORPS AIR STATION, EL TORO
Geotracker No. DOD100136000**

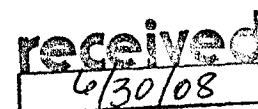
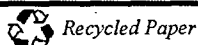
Dear Ms. Theroux:

We have reviewed the above referenced document, dated March 2008, which we received on March 21, 2008. This report presents a summary of results from groundwater monitoring for total petroleum hydrocarbons, benzene, toluene, ethylbenzene, and total xylenes, that was conducted at IRP Site 1 during November and December 2007. We have the following comments:

Section 7, Conclusions and Recommendations, Page 4: We disagree with your conclusion that the petroleum hydrocarbon release site does not pose a threat to water quality. Petroleum fuel hydrocarbons were detected in groundwater downgradient of the former disposal pits, which are a part of the larger IRP Site 1, Explosive Ordnance Disposal Range which is comprised of numerous former ordnance disposal pits. Your sampling results indicate a petroleum release at the site, within a limited area. It extends from approximately 2 feet below ground surface (bgs) to 20 feet bgs. The principle contaminants are diesel and gasoline, with the highest concentrations occurring at 2 feet below ground surface. This release area is defined based upon data obtained from samples "Trench 34" and "B-1". The concentrations of petroleum fuel contaminants, diesel and gasoline range, within this release area exceed the soil cleanup levels that were previously established for other petroleum corrective action sites located on the former MCAS. A sample from two feet bgs had concentrations of 37,000 milligrams per kilogram (mg/kg) of diesel range and 1,600 mg/kg of gasoline range petroleum hydrocarbons. A sample from twenty feet bgs had 19,000 mg/kg of diesel range and 710 mg/kg gasoline range petroleum hydrocarbons. We consider these petroleum fuel concentrations a threat or potential threat to groundwater quality.

It is our understanding that the Navy is proposing remedial actions under CERCLA that will address the threat to water quality from only two contaminants at IRP Site 1:

California Environmental Protection Agency



Ms. Theroux

- 2 -

June 25, 2008

perchlorate and naphthalene. Be advised that the Navy 's remedial actions at the former IRP Site 1 ordnance disposal pits must also address the petroleum hydrocarbon contamination that has been identified at the site.

For any questions, please call me at (951) 782-4494, or send email to jbroderick@waterboards.ca.gov.

Sincerely,



John Broderick
Site Cleanup/DoD Section

cc via email only: Richard Muza, U.S. EPA, Region 9
Quang Than, DTSC, Office of Military Facilities
Jim Callian, BRAC PMO WEST

California Environmental Protection Agency



Recycled Paper